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Attorneys for Defendant
PATRICK M. BYRNE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ROBERT HUNTER BIDEN.

Plaintiff,

V.

PATRICK M. BYRNE.

Defendants.

Case No. 2:23-cv-9430-SVW-PD

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
30 DAYS (L.R. 8-3)**

Complaint Served by Waiver of Service:
November 16, 2023
Current Response Date:
January 16, 2024
New Response Date:
February 6, 2024

1 Plaintiff Robert Hunter Biden (“Plaintiff”) and Defendant Patrick M. Byrne
2 (“Defendant,” and collectively with Plaintiff, the “Parties”), through their respective
3 attorneys of record herein and without waiving any rights, claims, or defenses they
4 have in this action, enter into this stipulation pursuant to Civil Local Rule 8-3, with
5 reference to the following circumstances:

6 WHEREAS, Plaintiff filed his complaint on November 8, 2023.

7 WHEREAS, Defendant’s attorney executed a Waiver of Service on November
8 16, 2023, which Plaintiff filed on November 21, 2023 [Dkt. No. 12].

9 WHEREAS, Defendant’s answer is due 60 days later, on January 16, 2024.

10 WHEREAS, Cypress LLP was recently retained to represent Defendant in this
11 action.

12 WHEREAS, Local Rule 8-3 provides in pertinent part that “A stipulation
13 extending the time to respond to the initial complaint shall be filed with the Clerk. If
14 the stipulation, together with any prior stipulations, does not extend the time for
15 more than a cumulative total of thirty (30) days from the date the response initially
16 would have been due, the stipulation need not be approved by the judge.”

17 WHEREAS, Plaintiff and Defendant met and conferred and agreed to extend
18 the deadline on which Defendant must file and serve a responsive pleading in this
19 action for twenty-one days, from January 16, 2024, to February 6, 2024.

20 WHEREAS, this extension does not extend Defendant’s deadline to respond
21 to the complaint to a date more than thirty days from the date the response initially
22 would have been due.

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1 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE:

2 1. Pursuant to Civil Local Rule 8-3, Defendant's deadline to file and serve
3 a response to Plaintiff's complaint shall be February 6, 2024.

4 **CYPRESS LLP**

5 DATED: January 16, 2024

6 By: /s/ Nabil L. Abu-Assal

7 Nabil L. Abu-Assal

8 Douglas P. Roy

9 Daniel A. Corren

10 Attorneys for Defendant Patrick M. Byrne

11 **WINSTON AND STSRAWN LLP**

12 DATED: January 16, 2024

13 By: /s/ Paul Benedict Salvaty

14 Paul Benedict Salvaty

15 Abbe David Lowell

16 Attorneys for Plaintiff Robert Hunter Biden

17 **ATTESTATION**

18 I attest that all the signatories listed above concur in this filing's contents and
19 have authorized the filing of this document.

20 DATED: January 16, 2024

21 By: /s/ Nabil L. Abu-Assal

22 Nabil L. Abu-Assal